



521 Newman Springs Road, Suite 23
Lincroft, New Jersey 07738
P: (732) 852-7500
F: (888) 635-1653
www.klugerhealey.com

DAVID A. WARD
dward@klugerhealey.com
Admitted in NJ and NY

July 24, 2024

Via ECF

Honorable Denise L. Cote, USDJ
United States District Court
Southern District of New York
500 Pearl Street. Courtroom 18B
New York, NY 10007

**Re: *Quantum Technology Innovations, LLC v. Pandora Media, LLC,*
24-cv-01102-DLC
Letter Motion for Extension of Time**

Your Honor:

We represent Plaintiff Quantum Technology Innovations, LLC in the above matter. We respectfully request a two week extension to file an Amended Complaint or respond to Defendant Pandora Media, LLC's motion to dismiss. As per the Court's July 1, 2024 Order (Dkt. No. 19), the response is currently due on July 26, 2024. We request an extension to August 9, 2024. The reason for this requested extension is that we continue to review and address Pandora's motion, which is likely to govern motion practice by Defendants in the Consolidated Cases. Given the Court's indication that we will likely not have a chance to file a further amendment, we respectfully request this additional time to finalize our pleading. Defendant Pandora Media does not oppose this request. This is our first request for an extension in this matter.

Respectfully yours,

/s/ David A. Ward
DAVID A. WARD